

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

INTERNATIONAL FRESH PRODUCE
ASSOCIATION, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF LABOR, *et al.*,

Defendants.

Case No. 1:24-cv-00309-HSO-BWR

UNOPPOSED MOTION TO WITHDRAW MICHAEL J. GAFFNEY AS COUNSEL

Pursuant to Local Rule 83.1(b)(3), Defendants¹ respectfully move to withdraw Michael J. Gaffney of the United States Department of Justice, Civil Division, Federal Programs Branch, as counsel for Defendants in this case. Mr. Gaffney is leaving the Department of Justice on March 7, 2025. Michael P. Clendenen and Eitan R. Sirkovich have previously entered appearances and remain as counsel for Defendants. Mr. Gaffney certifies that Defendants have been notified of the withdrawal prior to the filing of this motion. This withdrawal will not delay any proceedings.

A proposed order has been submitted to the Court.

CERTIFICATE OF CONFERENCE

Counsel for Defendants conferred with Plaintiffs' counsel regarding this motion through email on March 3, 2025. Plaintiffs do not oppose Defendants' motion.

Dated: March 4, 2025

Respectfully submitted,

ERIC D. McARTHUR
Deputy Assistant Attorney General

¹ This motion is brought on behalf of all Defendants, including the U.S. Department of Labor and the agency officials that have been sued in their official capacities.

Civil Division, Appellate Staff

JULIE STRAUS HARRIS
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/s/ Michael J. Gaffney
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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2025, I electronically filed the foregoing paper with the Clerk of Court using this Court's CM/ECF system, which will notify all counsel of record of such filing.

/s/ Michael J. Gaffney
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